

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI

SAMANTHA ZAMORA

PLAINTIFF

VS.

CASE NO. 3:16-CV-05028-RK

STELLAR MANAGEMENT GROUP, INC.,
D/B/A QUALITY SERVICE INTEGRITY

DEFENDANT

ORAL VIDEOTAPED DEPOSITION

OF

DAVID DELEON

(Taken September 23rd, 2016, at 12:45 p.m.)

EXHIBIT

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1 days after you were terminated?

2 A Yes. Thursday to Thursday, and then on Monday, I
3 went personally.

4 Q Did you ever speak with Samantha about the
5 lawsuit?

6 A I did.

7 Q And when was the first time you talked to her
8 about it?

9 A Let me see. Maybe a couple of days later.

10 MR. BUCHANAN: Can we take a break?

11 VIDEOGRAPHER: We're off the record at
12 2:36.

13 (WHEREUPON, after a break was taken,
14 the proceeding resumed as follows, to wit:)

15 VIDEOGRAPHER: We're back on the record
16 at 2:44. This is the beginning of tape two.

17 BY MR. ROSKENS:

18 Q David, has Samantha or her husband ever sent you
19 any text messages, or Facebook messages, or emails?

20 A Through text.

21 Q Was it -- was it her husband or was it Samantha
22 that sent you those house?

23 A Samantha.

24 Q When did Samantha first text message you, if you
25 know?

1 A Maybe about May -- May or June -- late May, June.

2 Q Do you still have those text messages?

3 A No.

4 Q You have your phone with you today, don't you?

5 A Yes.

6 Q Have you checked your phone to see if you still
7 have text messages from Samantha Zamora?

8 A Maybe on my other phone. I have two phones.

9 Q You have two phones?

10 A Yes.

11 Q Why do you have two phones?

12 A Because I want to have two phones.

13 Q So the phone you have with you now is not the
14 phone number that Samantha called you on?

15 A Yeah. It was on another one. I can give you my
16 other phone number.

17 Q What is the number of the phone you have with you
18 right now?

19 A (479) 295-0688.

20 Q And what is the phone number of the other one?

21 A Area code (501) 366-6897.

22 Q 6697?

23 A 6897. Let me just be in detail. (Witness
24 looking in billfold.) My dad left me a lawn business.
25 So the 501, it was when he had his business. So he

1 left me his phone, but I paid for it. This is -- if
2 you want to see my business card, the 501 number is
3 here. It has my name and all that, so . . .

4 Q (Reviewing document that was handed to him by
5 witness.) Seasonal Services?

6 A Yes. My dad, back in the day.

7 Q Where is that located?

8 A Well, when this area -- back when it was 501,
9 that's how long my dad had his business. So he's had
10 it for a while, but gave it to me. I just, every now
11 and then, do jobs from the -- lone customers he had.

12 Q Why did you give Samantha that phone number as
13 opposed to the phone number of the phone that you
14 carry with you?

15 A At the time, I gave her that one. That wasn't a
16 specific, I had to give her both or one. I decided to
17 give her that one.

18 Q Do you still have that other phone?

19 A Yes. It's -- it's hooked up through Verizon.

20 Q Do you have it here with you today?

21 A No. I don't have it with me.

22 Q Would you be willing to produce the text messages
23 between you and Samantha?

24 A Yes.

25 Q During the text message exchanges, did you and